

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

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TIARA GRAYSON,  
Plaintiff,

-against-

THE CITY OF ROCHESTER, a municipal entity,  
MARLON WILLIAMS, NICHOLAS VANDEMAR, "JOHN  
DOE POLICE OFFICER 1-200" (names and number of  
whom are unknown at present), and other unidentified  
members of the Rochester Police Department and  
Monroe County Sheriff's Office,  
Defendants.

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**DECLARATION IN SUPPORT OF  
CITY DEFENDANTS' MOTION TO  
DISMISS THE AMENDED COMPLAINT  
Case No.: 21-CV-06719**

**JOHN M. CAMPOLIETO**, an attorney duly admitted to practice law before this Court, declares, pursuant to 28 U.S.C. §1746, the following:

1. I am a Municipal Attorney for the City of Rochester, admitted to practice law before this court, and represent the City of Rochester in this action.
2. I submit this Declaration in support of Defendant City of Rochester's Motion to Dismiss, pursuant to FED. R. CIV. P. 12(b)(6).
3. The information set forth herein is based upon my personal knowledge, a review of the proceedings in this action, and a review of relevant case law.
4. Attached to this Declaration is Exhibit A, the Amended Complaint initiating this action.

**WHEREFORE**, the Complaint should be dismissed in its entirety and with prejudice.

Dated: May 17, 2022

/s/ John M. Campolieto

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BY: John M. Campolieto, Esq., *of Counsel*  
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